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*Proposed Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND UNITED STATES TRUSTEE
EXTENDING TIME TO RESPOND TO
MOTIONS TO BE HEARD ON
FEBRUARY 27, 2019**

[No Hearing Requested]

STIPULATION TO EXTEND TIME FOR UST

1 This stipulation and agreement for order (“Stipulation”) is entered into by PG&E
2 Corporation (“PG&E Corp.”) and Pacific Gas and Electric Company (the “Utility”), as debtors
3 and debtors in possession (collectively, the “Debtors”) and the Office of the United States
4 Trustee (the “U.S. Trustee”). The Debtors and the U.S. Trustee are referred to in this Stipulation
5 collectively as the “Parties,” and each as a “Party.” The Parties hereby stipulate and agree as
6 follows:

7 **RECITALS**

8 A. On February 6, 2019, the Debtors filed a notice of hearing [Dkt. 353] noticing
9 sixteen (16) motions listed therein (the “Motions”) for a hearing before the Court at 9:30 a.m. on
10 February 27, 2019.

11 B. Under Local Bankruptcy Rule 9014-1(c)(2), any opposition or response to the
12 Motions must be filed and served on counsel for the Debtors no later than February 20, 2019.

13 C. On February 19, 2019, counsel for the U.S. Trustee requested, and proposed
14 counsel for the Debtors agreed, that the time for the U.S. Trustee to respond to the Motions be
15 extended by two days.

16 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
17 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
18 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
19 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
20 **THAT:**

21 1. The time for the U.S. Trustee to file and serve any response or opposition
22 to the Motions is extended through 4:00 p.m. on February 22, 2019.

23 *[Signatures on Next Page]*
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1 Dated: February 19, 2019

2 KELLER & BENVENUTTI LLP

3
4 /s/ Jane Kim

5 Jane Kim

6 *Proposed Attorneys for Debtors
and Debtors in Possession*

Dated: February 20, 2019

OFFICE OF THE UNITED STATES
TRUSTEE

/s/ Marta E. Villacorta

Marta E. Villacorta

Trial Attorney

*Attorney for Andrew R. Vara,
Acting United States Trustee for Region 3¹*

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27 ¹ Andrew R. Vara, Acting United States Trustee for Region 3, is acting in this appointment for Tracy Hope Davis,
United States Trustee for Region 17, who is recused from the above-captioned cases.